

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**PATTY BEALL, MATTHEW
MAXWELL, TALINA MCELHANY,
KELLY HAMPTON, CASEY BROWN,
JASON BONNER, KEVIN TULLOS,
ANTHONY DODD, ILENE MEYERS,
TOM O'HAVER, JOY BIBLES, DON
LOCCHI AND MELISSA PASTOR,
individually and on behalf of all other
similarly situated;**

Plaintiffs,

**TYLER TECHNOLOGIES, INC. AND
EDP ENTERPRISES, INC.
Defendants.**

[illegible]

2:08-cv-422 TJW

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

Plaintiffs Patty Beall, Matthew Maxwell, Talina McElhany, Kelly Hampton, Casey Brown, Jason Bonner, Kevin Tullos, Anthony Dodd, Ilene Meyers, Tom O’Haver, Joy Bibles, Don Locchi and Melissa Pastor and Defendants Tyler Technologies, Inc. (“Tyler”) and EDP Enterprises, Inc. (“EDP”) move this Court to enter the proposed Agreed Protective Order (the “Order”) attached hereto as Exhibit A and in support of this request respectfully show the Court as follows:

Plaintiffs allege they were improperly classified as exempt employees and claim to have been denied overtime in violation of the Fair Labor Standards Act (“FLSA”). Defendants deny Plaintiffs’ allegations and assert that Plaintiffs were properly classified. The issues raised by this

action involve discovery of information the parties deem proprietary and confidential. The parties seek to protect against the dissemination of such information, while at the same time not burdening the Court with resolving objections to the production or designation of such confidential and proprietary information prior to its actual production. Therefore, pursuant to Rules 26(c) and 29(b) of the Federal Rules of Civil Procedure, and the Eastern District of Texas Local Rule 5(a)(7), the parties jointly request that the Court enter the proposed order attached hereto as Exhibit A.

AGREED:

/s/ Laureen F. Bagley

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Laureen F. Bagley
Texas Bar No. 24010522

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/s/ Ellen L. Perlioni

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TYLER TECHNOLOGIES, INC. AND
EDP ENTERPRISES, INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served via the Court's electronic filing system on this 7th day of August, 2009, as follows:

John D. Sloan, Jr.
Laureen F. Bagley
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/s/ Ellen L. Perlioni